

State Water Resources Control Board

February 20, 2019

(Via email and Certified Mail)

CERTIFIED MAIL

NO. 7018 0680 0000 1017 5710

Mr. Anthony Allegra
Environmental Health & Safety Specialist
Northern California Power Agency
PO Box 663
Middletown, California 95461
anthony.allegra@ncpa.com

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEM
LOCATED AT THE NORTHERN CALIFORNIA POWER AGENCY GEO
FACILITY, 12000 RIDGE ROAD, MIDDLETOWN**

Dear Mr. Allegra:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the UST at your facility on February 7, 2019, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and California Code of Regulations (CCR), title 23, chapter 16 & 18:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	Failure to Perform Overfill Prevention Equipment Inspection – The overfill prevention equipment inspection was due October 13, 2018.	Diesel	February 7, 2019	Ongoing	23 CCR 2637.2(a)
2	Failure to Maintain Site Map/Plot Plan – The site map in CERS does not show the location of UST piping.	Diesel	February 7, 2019	Ongoing	23 CCR 2711(a)(8)
3	Failure to Maintain Monitoring Plan – In CERS, under pipe monitoring, suction piping meets exemption criteria should state “No” as the piping system is conventional, not safe suction.	Diesel	February 7, 2019	Ongoing	23 CCR 2711(a)(9)

Office of Enforcement | 801 K Street, Suite 2300 | Sacramento, CA 95814 | 916.341.5272

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

No.	Violation	Tank	Start Date	Stop Date	Regulation
4	Failure to Install Monitoring Equipment According to Manufacturer's Instructions – The automated tank gauge epoxy pack is located outside of a weather proof electrical junction box. According to Veeder Root, epoxy packs must be placed inside a weather proof electrical junction box.	Diesel	February 7, 2019	Ongoing	23 CCR 2641(j)
5	Failure to Perform Product Line Integrity Test – Line integrity testing is not being performed. The line integrity test should be conducted once every 36 months.	Diesel	February 7, 2019	Ongoing	23 CCR 2643(d)
6	Failure to Maintain Tank Information – The UST date of install is incorrect in CERS. Additionally, under UST facility operating permit application, financial responsibility mechanisms, exemption should state "No."	Diesel	February 7, 2019	Ongoing	23 CCR 2711(a)
7	Failure to Maintain Financial Responsibility – The Certificate of Financial Responsibility and current supporting documentation was not available at the time of inspection.	Diesel	February 7, 2019	Ongoing	23 CCR 2711(a)(11) & 2809.1(c); H&SC 25292.2
8	Failure to Maintain Monthly Designated Operator (DO) Inspection Records – The January and March-September 2018 DO inspection reports were not available at the time of inspection.	Diesel	February 7, 2019	February 8, 2019	23 CCR 2716(f)
9	Failure to Maintain Operating Permit Onsite – A current UST operating permit was not available at the time of inspection.	Diesel	February 7, 2019	February 14, 2019	23 CCR 2712(i)
10	Failure to Maintain UST Records – The 2016 and 2018 Monitoring System Certification and 2017 and 2018 Spill Containment Test were not available at the time of inspection.	Diesel	February 7, 2019	February 14, 2019	23 CCR 2712(b); H&SC 25293

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and County of Sonoma Fire and Emergency Services Department within sixty (60) days from the date of this letter. Have your DO make specific notations in the next monthly DO report indicating the ongoing violations have been corrected. The monthly DO report and any associated photos must be submitted as proof of compliance.

As a reminder, all single-walled USTs must be permanently closed by December 31, 2025. Please consult with County of Sonoma Fire and Emergency Services Department to remove your tank before the deadline.

Please send all compliance documentation to the following:

State Water Board

Ms. Jenna Hartman
UST Enforcement Unit
Office of Enforcement
State Water Resources Control Board
801 K Street, Suite 2300
Sacramento, California 95814
jenna.hartman@waterboards.ca.gov

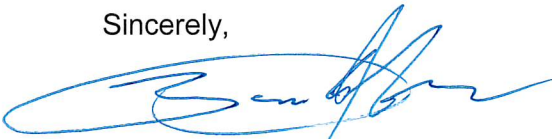
Local CUPA

Mr. Andrew Parsons
Assistant Fire Marshal/
Hazardous Materials Program Manager
County of Sonoma Fire and Emergency
Services Department
2300 County Center Drive, Suite 220B
Santa Rosa, California 95403
andrew.parsons@sonoma-county.org

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 323-0600, or by email at brian.taylor@waterboards.ca.gov.

Sincerely,



Mr. Brian Taylor
Senior Engineering Geologist (Supv.)
UST Enforcement Unit
Office of Enforcement

cc: *(via email only)*

Mr. Andrew Parsons
Assistant Fire Marshal/
Hazardous Materials Program Manager
County of Sonoma Fire and Emergency
Services Department
andrew.parsons@sonoma-county.org

Mr. Charles Rivers
Fire Inspector II
County of Sonoma Fire and Emergency
Services Department
charles.rivers@sonoma-county.org